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July 28, 2025

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**Via ECF**

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Storm, 23 Cr. 430 (KPF)**

Dear Judge Failla:

On behalf of our client, defendant Roman Storm, we write to respectfully request that the Court include in its jury charge the following Theory of the Defense instruction:

Mr. Storm has pled not guilty to all three charges. Mr. Storm contends that he did not agree with anyone to violate the law. Instead, Mr. Storm contends that he agreed with the Peppersec co-founders to develop privacy software for lawful purposes, and that he never willfully engaged in a conspiracy with anyone with the goal of furthering money laundering, operating an unlicensed money transmitting business, or evading international sanctions.

The defense will be ready to discuss this instruction with the Court at the charge conference.

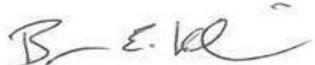
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Respectfully submitted,



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